

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of Bernard
L. Madoff,

Plaintiff,

v.

BARRENECHE, INC., *et al.*,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 12-01702 (SMB)

**MOTION TO WITHDRAW MARK G. CUNHA AS AN ATTORNEY OF RECORD
PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(e)**

This motion (the “Motion”) seeks, pursuant to Local Rule 2090-1(e) of the Local Bankruptcy Rules, an order withdrawing Mark G. Cunha, Esq. of the law firm Simpson Thacher & Bartlett LLP (“Simpson Thacher”) as an attorney of record for Defendants Barreneche, Inc., Dove Hill Trust, Fairfield Capital Partners, Fortuna Asset Management Inc., Selecta Financial Corporation Inc., and Share Management LLC (the “Defendants”). This Motion further seeks that Mark G. Cunha, Esq.’s name be removed from any applicable service lists, including the Court’s CM/ECF electronic notification list,

maintained in the above-captioned cases. Simpson Thacher will continue to serve as attorneys for the Defendants.

I, Peter E. Kazanoff, Esq., am an attorney at Simpson Thacher who has previously appeared as an attorney of record in this case on behalf of the Defendants. Because I will continue to serve as an attorney of record in this case, the Court's approval of this Motion will not impact Simpson Thacher's representation of the Defendants, and will not result in prejudice or delay to any party.

WHEREFORE, for the reasons set forth herein, I respectfully request that the Court grant this Motion and order that Mark G. Cunha, Esq. is withdrawn as an attorney of record and, thus, will no longer receive service or electronic notifications in the above-captioned cases. A proposed form of order granting the relief requested herein is annexed hereto as Exhibit A.

Dated: April 30, 2018
New York, New York

Respectfully submitted,

By: /s/ Peter E. Kazanoff
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*Attorneys for Barreneche, Inc., Dove Hill Trust,
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Management Inc., Selecta Financial Corporation
Inc., and Share Management LLC*